

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Brandon. Rondon	)	
an individual,	)	
	)	
Plaintiff,	)	Case No. 1:24-cv-01494
	)	
v.	)	
	)	
Allstate Insurance Company	)	
	)	
Defendant.	)	

**PLAINTIFF’S RESPONSE TO COURT ORDER DATED  
SEPTEMBER 20, 2025**

Plaintiff, Brandon Rondon, through his undersigned counsel, Mitchell S. Chaban of Latimer LeVay Fyock LLC, as and for his Response to Court Order dated September 20, 2025, states:

1. Plaintiff, Brandon Rondon (“Brandon”), respectfully submits the Declaration of Brandon Rondon, filed contemporaneously herewith and attached as Exhibit A, in response to this Court’s Order dated September 20, 2025 (Dkt. # 47), directing him to explain why sanctions should not be imposed for his failure to produce certain tax returns and to respond to Defendant’s motion to compel.

2. As more fully explained in his Declaration, Brandon did not willfully disregard this Court’s directives. Rather, he was unable to produce his 2022 and 2023 personal tax returns because his accountant is currently in the process of preparing amended versions. Based upon his accountant’s representations, Brandon can and will produce the 2022 and 2023 personal returns no later than Monday, October 6, 2025, and anticipates being able to do so sooner.

3. Brandon has, in good faith, already produced substantial tax-related documentation in this matter, including his business tax returns for the years 2019 through 2023, as well as his personal tax returns for 2019 through 2021. The 2024 returns, both personal and business, have not yet been produced only because valid extensions of the filing deadlines were obtained. Brandon is committed to producing the 2024 returns promptly once they are filed.

4. Brandon acknowledges and regrets missing the deadline for responding to Defendant's motion to compel. This oversight occurred during a period of transition in which his prior counsel withdrew, and he was required to secure new counsel in Chicago.

5. For the foregoing reasons, and as further detailed in his Declaration, Brandon respectfully requests that the Court exercise its discretion to refrain from imposing sanctions. Brandon, together with his undersigned new counsel, is fully committed to timely and complete compliance with all future orders of this Court.

Respectfully Submitted,

Brandon Rondon

By: /s/Mitchell Chaban  
One of his Attorneys

Mitchell S. Chaban ([mchaban@llflegal.com](mailto:mchaban@llflegal.com))  
Attorneys for Defendant  
**LATIMER LEVAY FYOCK, LLC**  
55 West Monroe Street, Suite 1100  
Chicago, IL 60603  
Phone: 312-422-8000  
Fax: 312-422-8001